



Reports cover the whole of the UK; some events may travel to different locations rather than be a permanent fixture, and some may be seasonal. Locations of work included circuses, racecourses, Christmas markets, fairgrounds, golf courses and water sports venues.

Potential victims are often Romanian, under the age of 30, and male.



Under 30



Payment

One of the most common complaints is non-payment of the National Minimum Wage. Some workers do not hold bank accounts or National Insurance numbers. Deductions may be taken from wages for accommodation, and as a guarantee that a worker will not leave their employment before the end of their contract.

Long hours of work (90 hours per week or more in some cases), have led to health and safety issues.

Accommodation

Most workers are provided with accommodation in caravans, the standard of which can vary. Others are provided with accommodation in residential properties shared with other workers. In a small number of cases, workers have slept in vehicles.

Key Questions to Prevent and Identify Labour Exploitation



- How do you make workers aware of their employment entitlements, and where they should direct complaints or queries?
- Has your organisation undertaken a modern slavery/labour exploitation risk assessment?
- What mechanisms are in place to understand high risk workers' recruitment and working conditions? Are these effective?
- Are business policies, including whistleblowing, ethical rights and health and safety, all fit for purpose in identifying, reporting and handling reports of labour exploitation and modern slavery?
- Do members of your organisation receive training on spotting the signs of modern slavery and labour exploitation?
- Do you have an internal escalation process if you identify an issue of exploitation? Do you know who to contact?
- Do you know and understand each level of your supply chain, including contractors? Do you conduct background checks?



Gangmasters & Labour Abuse Authority

What to consider when reporting intelligence

Example: Vulnerable young workers are being exploited at a Christmas Market. They work long hours and are paid cash in hand. The workers do not get any training or protective equipment.

What else? Provide more details about the workers involved – do you know what language they speak or what nationality they are? Are they local or did they move for this employment? Do any appear to be under the age of 18? Are they male or female? What hours do they work? What role are they in? How does recruitment occur? Are there any more company details? Has a potential exploiter been sighted? Are their movements monitored or restricted?

Whilst not all factors may be known, any additional details will assist the GLAA in identifying people and locations involved for operational purposes and to improve our intelligence picture.



Resources

GLAA resources are available at <https://www.gla.gov.uk/publications/resources/> including a useful “Spotting the Signs” leaflet at <https://www.gla.gov.uk/media/4285/spot-the-signs-glaa.pdf>

Who to Contact

Please report to the GLAA:

- Unlicensed trading in the regulated sector (agriculture, horticulture, shellfish gathering and any associated processing and packaging) across the UK.
- Labour market offences (non-payment of the National Minimum Wage, breach of Employment Agency Standards) in the regulated sector in England and Wales
- Individuals, labour users or labour providers who are suspected of modern slavery and human trafficking in any labour industry (excluding sexual exploitation), or individuals who are potential victims of such activity in England and Wales.

Please report to partners:

- Issues of National Minimum Wage only, in sectors that are not GLAA regulated to the HMRC NMW team (<https://www.gov.uk/government/organisations/hm-revenue-customs/contact/national-minimum-wage-enquiries-and-complaints>)
- Health and safety issues only (all sectors) to the Health and Safety Executive (<http://www.hse.gov.uk/contact/concerns.htm>)
- Workplace relations and employment law issues (including contract issues, discrimination and grievances) to the Advisory, Conciliation and Arbitration Service (ACAS) (<https://www.acas.org.uk/index.aspx?articleid=1410>)
- When there is an immediate threat to life contact the police emergency number.
- To report labour exploitation, human trafficking or modern slavery outside of the regulated sectors in Northern Ireland or Scotland, contact the local police service